

AO 91 (Rev. 11/11) Criminal Complaint

United States District Court
Southern District of Texas
FILED

UNITED STATES DISTRICT COURT

MAY 02 2020

for the

Southern District of Texas

David J. Bradley, Clerk

United States of America

v.

Gracie Lee PEREZ YOB: 1990, USC
Melanie Lizbeth GARZA YOB: 2000, USC

Case No.

M-20- 0922-M

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 1, 2020 in the county of Starr in the
Southern District of Texas, the defendant(s) violated:

Code Section

Offense Description

18 USC 1001(a)(2)

Knowingly and willfully makes any materially false, fictitious, or fraudulent statement or representation.

8 USC 1324(a)(1)(A)(ii) & 1324(a)
(2)(B)(ii)

Knowing or in reckless disregard of the fact that an alien has come to, entered, or remains in the United States in violation of law, transports, or moves or attempts to transport or move such alien within the United States by transportation or otherwise, in furtherance of such violation of law for the purpose of commercial advantage or private financial gain

This criminal complaint is based on these facts:

See Attachment A

☒ Continued on the attached sheet.Submitted by reliable electronic means, sworn to and attested
to telephonically per Fed. R. Cr. P. 4.1, and probable cause
found on:

Approved AUSA Laura Garcia


Date: 05/02/2020 @ 7:36 p.m.City and state: McAllen, Texas

/s/ Victor E. Reyna

Complainant's signature

Victor E. Reyna, CBP Officer

Printed name and title


Judge's signature

Juan F. Alanis U.S. Magistrate Judge

Printed name and title

ATTACHMENT A

On May 1, 2020 a vehicle driven by Gracie Lee PEREZ (PEREZ) entered the United States from Mexico through the Rio Grande City Port of Entry. Within the vehicle was adult passenger Melanie Lizbeth GARZA (GARZA) and three minor children.

Two of the minor children transported were later determined to be B.J.V.G and J.Y.V.G citizens of Mexico with no legal status to enter or remain within the United States.

At primary inspection, the defendants presented to the U.S. Customs and Border Protection Officers (CBPOs) two State of Texas Starr County Birth Certificates bearing the names "J.G" and "D.G" as proof of identification and citizenship for the two minor children later determined to be B.J.V.G and J.Y.V.G. The defendants claimed the two minor children were siblings of GARZA.

Both defendants provided U.S. CBPOs materially false and fictitious statements by claiming the two minors B.J.V.G and J.Y.V.G were family, United States citizens and by providing the false birth certificates.

In secondary inspection, the defendants admitted that the children were not in fact citizens of the United States nor family members.

PEREZ stated she agreed to transport the children from Mexico to the United States for monetary gain and would be turning the children over to an unknown individual at the Rio Grande City Walmart.

GARZA revealed she provided the United States Birth Certificates which rightfully belong to her younger siblings to be used in the smuggling event. GARZA also admitted she received money from PEREZ immediately before arriving to the Port of Entry.

The defendants knew both minor children B.J.V.G and J.Y.V.G were aliens with no legal status to enter or remain in the United States.

Documents later provided to U.S. CBPOs by the family members of B.J.V.G and J.Y.V.G reveal their true identity and their Mexican nationality.